

To: laychak@water.ca.gov
Subject: PPA

Here's my comments on the February 23 memo and minimal additions urbans would need to vote on a preferred alternative at the BDAC meeting. Frankly, the water community's feeling is that a vote on any version of a PPA could prejudice the state/federal negotiation and is inadvisable. I understand the environmental interests don't want a vote either. A yes or no vote could send unintended messages. Think it is better that we just take additional stakeholder comment.

Having said that, here are some concerns below. I'll also fax a marked up version of Alex's preamble to you.

The proposed motion (as described in the 2/23 memo from Madigan) should add the followign bullets

"optimizing through Delta conveyance and providing an implementable contingent conveyance strategy in the case an optimized through delta and other water quality improvement strategies do not meet performance criteria or goals."

Another bullet should be added which reflects that adoption of the PPA and implementation of the ecosystem restoration plan and environmental water account will provide for assurances that delta fisheries are in a no jeopardy condition and that water supply assurances will be given through stage I of the plan.

A bullet indicating Project operating rules will revised to incorporate "alarms" for water quality and supply as well as fishery .

The PPA needs to specify which storage alternatives move to the next round and should include, Shasta enlargement, Los Vaqueros enlargement, Millerton and Sites.

Specific groundwater development amounts should be specified for action (200 kaf Sac Valley, 400kaf San Joaquin)

Implementation of South Delta projects or equivalents providing similar or greater benefits

Comments on other's comments, by the numbers in the memo:

3. I do not agree that the PPA does not balance the competing water needs of in-delta and export interests. Regardless, I am in agreement with Alex's notion of truly optimizing through Delta first before any contingent strategy is pursued. This optimization could well include a screened Sacramento River diversion and likely will have to as a part of a balanced package including regional north/south water exchanges if no isolated facility is to be built.

9 I do not agree with guaranteed outflow as stated. There is no practical way to do that - we can't control hydrology. Water supplies or quality aren't guaranteed either. All we have is goals and process options to achieve them. We can however develop science based minimum outflow goals and fund tools to achieve them.

16. CALFED can't identify a dedicated source of water as stated. It can only provide resources to achieve ERP flow objectives, through something like an EWA.

28. Beneficiaries pay should only be applied where discrete improvements in reliability or quality provided through CALFED are measurable over current conditions and the beneficiary concurs the benefit is worth the cost

· Hope this helps.

byron